

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:)	
)	Chapter 13
Marcella Heard)	
)	Case No. 17-10695
)	
Debtor(s))	Judge Cox

NOTICE OF MOTION

TO: See attached service list

PLEASE TAKE NOTICE that on May 7, 2018 at 9:00 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Cox, or any other judge sitting in her stead, in the courtroom usually occupied by her in Courtroom 680 of the Dirksen Federal Building, 219 S Dearborn Street, Chicago Illinois 60604, and then and there move for entry of an order in accordance with the prayer of the motion attached hereto, at which time and place you may appear if you so desire.

/s/ Edwin L Feld

CERTIFICATION

I, Edwin L Feld, the attorney in the above captioned case, state that I served the above notice and motion upon the above named parties, via United States Mail, properly addressed with postage fully prepaid before the hour of 4:30 pm, at 1 N LaSalle Street, Chicago, Illinois, on April 18, 2018.

/s/ Edwin L Feld

Edwin L Feld
Edwin L Feld & Associates, LLC
1 N LaSalle Street, Suite 1225
Chicago Illinois 60602
(312) 263-2100

Acceptance Now
444 Highway 96 E
Saint Paul, MN 55127

Affiliated Credit Services, Inc.
PO Box 7739
Rochester, MN 55903

AFNI
P.O. Box 3427
Bloomington, IL 61702

AMIC
111 N Wabash, Suite 620
Chicago, IL 60602

Arnold Scott Harris, PC
111 W Jackson Blvd, Suite 600
Chicago, IL 60604

AT&T
PO Box 6416
Carol Stream, IL 60197

AT&T Midwest
c/o IC Systems
444 Highway 96 East, PO Box 64437
Saint Paul, MN 55164

AT&T Mobility
PO Box 6416
Carol Stream, IL 60197

AT&T U-Verse
P.O. Box 5014
Carol Stream, IL 60197-5014

Banfield Pet Hospital
9277 W 159th St
Tinley Park, IL 60477

Beal Bank
6000 Legacy Dr
Plano, TX 75024

Best Buy CBNA
PO Box 6497
Sioux Falls, SD 57117

Chase
Cardmember Service
PO Box 15153
Wilmington, DE 19886

Chgo Dept of Finance
PO Box 88292
Chicago, IL 60680

Chgo Dept of Water
PO Box 6330
Chicago, IL 60680

City of Chgo EMS
33589 Treasury Center
Chicago, IL 60694

City of Markham
Photo Enforcement
75 Remittance Dr, Suite 6658
Chicago, IL 60675

Comcast
P.O. Box 3002
Southeastern, PA 19398-3002

Comenity HSN
PO Box 183003
Columbus, OH 43218

Credit One
PO Box 625
Metairie, LA 70004

Directv
PO Box 9001069
Louisville, KY 40290

Enhanced Recovery Corp, LLC
8014 Bayberry Rd
Jacksonville, FL 32256-7412

EOS CCA
PO Box 806
Norwell, MA 02061

Fifth Third Bank / Card Center
PO Box 740789
Cincinnati, OH 45274-0789

Fingerhut
6250 Ridgewood Rd
Saint Cloud, MN 56303

Ginnys
1112 7th Avenue
Monroe, WI 53566

Healthlab
25 N Winfield Rd
Winfield, IL 60190

Huddleston Med Services
11600 S Kedzie Ave #A
Alsip, IL 60803

IC Systems Inc
PO Box 64378
St Paul, MN 55164

Kohls
PO Box 3115
Milwaukee, WI 53201

Linebarger, Goggan
233 S. Wacker, Ste 4030
Chicago, IL 60606

Little Company of Mary Hospital
PO Box 97677
Chicago, IL 60678

Malcolm S. Gerald & Assoc
332 S. Michigan, Ste 514
Chicago, IL 60604

Manley Deas Kochalski, LLC
One East Wacker, Suite 1250
Chicago, IL 60601

Mirshed Med Center
4255 W 63rd St
Chicago, IL 60629

Northwestern Medicine
28155 Network Place
Chicago, IL 60673

Peoples Energy
130 E Randolph Dr, 20th Floor
Chicago, IL 60601

PRA
120 Corporate Blvd, Suite 100
Norfolk, VA 23502

QVC
PO Box 1900
West Chester, PA 19380

Robert Semrad & Assoc
20 S Clark St, 28th Floor
Chicago, IL 60603

Sonrisa Family Dental
5050 S Kedzie
Chicago, IL 60632

State Collection Service
2509 S. Stoughton Rd
Madison, WI 53716

Swiss Colony
1112 7th Avenue
PO Box 2814
Monroe, WI 53566

Target
PO Box 660170
Dallas, TX 75266

Transworld Systems, Inc
500 Virginia Dr, Suite 514
Fort Washington, PA 19034

United Fin
333 Washington Blvd
Marina Del Rey, CA 90292

Marcella Heard
1504 W 73rd Street
Chicago, IL 60636

Tom Vaughn
55 E Monroe Street, Ste 3850
Chicago IL 60603

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MOTION TO APPROVE SETTLEMENT

NOW COME the Debtors herein, Marcella Heard, by and through their attorneys, Edwin Feld, and Edwin L Feld & Associates, LLC and respectfully request that this Honorable Court enter an order Approving the Debtor's Personal Injury settlement, and in support of this motion, state as follows:

1. The above-referenced case was filed on April 4, 2017.
2. The Chapter 13 Plan was confirmed on August 21, 2017.
3. At the time of filing, the Debtor disclosed on her Schedules that she had a claim against Family Dollar for Personal Injury due to a rotator cuff injury suffered in a Family Dollar Store. The Debtor's Confirmed plan contains a term in Section G which reads "Debtor shall be entitled to her exemptions applied towards her personal injury claim; any monies received beyond those exemptions shall be provided to the Trustee to pay Debtor's unsecured creditors."
4. Prior to the filing of the Instant Chapter 13, The Debtor retained Grazian and Volpe, Attorneys at Law to represent her in the Personal Injury case. The case is currently pending in the Federal District Court for the Northern District of Illinois before Judge Kim, Case # 16 CV 10313 Marcella Heard v Family Dollar.
5. The Debtor has reached a settlement agreement with Family Dollar to avoid further litigation. A copy of the settlement statement is attached herein as an exhibit. The total amount of the settlement is \$60,000. The Debtor's Attorneys are due \$20,000 in Attorney fees for their work performed. There is a \$22,500 lien on the Settlement from Orland Park Orthopedics for medical services rendered. There is also a \$500 lien on the settlement from Windy City Anesthesia for services rendered. In addition to the Attorney's Fees and Medical liens, there will be \$1,284.70 in court costs deducted from the settlement, as well as an \$819.36 advance from AA Legal Cash

Advance. The total of deductions would be \$45,104.06, leaving net proceeds to the Debtor of \$14,895.94

6. The Amount of the net proceeds of the settlement would be within the Debtors' Claimed \$15,000 exemption.

WHEREFORE, the Debtors respectfully request that this Honorable Court enter an Order Approving Debtor's Personal Injury Settlement, and further relief that this Court deems appropriate.

Respectfully Submitted,

/s/ Edwin L Feld
Attorney for Debtors

Edwin L Feld
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1 N LaSalle Street, Suite 1225
Chicago Illinois 60602
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